

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Clint Rasschaert, Ed Risch, Pamela Schiller, Verna Schuna, Eric Gedrose, and Justin Short, individually and on behalf of the putative Classes,

Plaintiffs,

v.

**JOINT MOTION FOR PRELIMINARY
APPROVAL OF PROPOSED CLASS
ACTION SETTLEMENT**

Frontier Communications Corporation, Frontier Communications of America, Inc., Frontier Communications of Minnesota, Citizens Telecommunications Company of Minnesota, LLC, and Citizens Telecommunications Company of New York,

Defendants.

Court File No. 11-cv-02963 DWF/JSM

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs and Defendants (the “parties”), by and through their counsel, hereby respectfully move the Court for an Order Granting Preliminary Approval of a Proposed Class Action Settlement.

The proposed settlement is a partial settlement of the claims set forth in this action pertaining to the Minnesota Plaintiffs’ sales-tax-related claims. The parties have signed a terms sheet setting forth the material terms of a settlement and are working diligently to formalize a final settlement agreement. (The parties agree that settlement is contingent, among other things, on the execution of a final settlement agreement.) The parties shall file a joint memorandum and/or separate memoranda in support of the instant motion,

along with a copy of the final settlement agreement, no later than 12:00 p.m. CST on November 8, 2012.

Dated: October 31, 2012

NICHOLS KASTER, PLLP

s/E. Michelle Drake

E. Michelle Drake (#0387366)
Rebekah L. Bailey (#0389599)
Anna P. Prakash (#0351362)
4600 IDS Center
80 South 8th Street
Minneapolis, MN 55402
Telephone: 612.256.3200

Matthew C. Helland (#346214)
NICHOLS KASTER, LLP
One Embarcadero Center
Suite 720
San Francisco, CA 94111
Telephone: 415.277.7238

ATTORNEYS FOR PLAINTIFFS

Dated: October 31, 2012

MAYER BROWN, LLP

s/Archis A. Parasharami

Archis A. Parasharami*

*admitted *pro hac vice*

Kevin Ranlett
1999 K Street NW
Washington D.C. 20006
Telephone: 202.263.3000

Robert E. Cattnach (#0153734)
Bryan C. Keane (#0328716)
DORSEY & WHITNEY, LLP
150 South 6th Street, Ste 1500
Minneapolis MN 55402
Telephone: 612.340.2600

ATTORNEYS FOR DEFENDANTS